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Texas-New Mexico Power Company

2022 Energy Efficiency Plan and Report

16 Tex. Admin. Code §§§ 25.181, 25.182, and 25.183

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Introduction

Texas-New Mexico Power Company ("TNMP") presents this Energy Efficiency Plan and Report ("EEPR") to comply with 16 Tex. Admin. Code §§§ 25.181, 25.182, and 25.183 ("TAC"), which are the sections of the Energy Efficiency Rule ("EE Rule") implementing Public Utility Regulatory Act ("PURA") § 39.905. As mandated by this section of PURA, the EE Rule requires that each investor-owned electric utility achieve the following minimum goals through market-based standard offer programs ("SOPs"), targeted market transformation programs ("MTPs") or utility self-delivered programs:

"An electric utility shall administer a portfolio of energy efficiency programs to acquire, at a minimum, the following:

(A) Beginning with the 2013 program year, until the trigger described in subparagraph (B) of this paragraph is reached, the utility shall acquire a 30% reduction of its annual growth in demand of residential and commercial customers.

(B) If the demand reduction goal to be acquired by a utility under subparagraph (A) of this paragraph is equivalent to at least four-tenths of 1% its summer weather-adjusted peak demand for the combined residential and commercial customers for the previous program year, the utility shall meet the energy efficiency goal described in subparagraph (C) of this paragraph for each subsequent program year.

(C) Once the trigger described in subparagraph (B) of this paragraph is reached, the utility shall acquire four-tenths of 1% of its summer weather-adjusted peak demand for the combined residential and commercial customers for the previous program year.

(D) Except as adjusted in accordance with subsection (u) of this section, a utility's demand reduction goal in any year shall not be lower than its goal for the prior year, unless the commission establishes a goal for a utility pursuant to paragraph (2) of this subsection."

The EE Rule includes specific requirements related to the implementation of SOPs, MTPs, and utility self-delivered programs that control the manner in which investor-owned electric utilities must administer their portfolio of energy efficiency programs in order to achieve their mandated energy efficiency savings goals. TNMP's EEPR is intended to describe how TNMP intends to meet its statutory savings goals through implementation of energy efficiency programs in a manner that complies with PURA § 39.905 and the EE Rule. The following section provides a description of the information contained in each of the subsequent sections and appendix.

Energy Efficiency Plan and Report Organization

This EEPR consists of an executive summary, twelve sections, and an appendix.

Executive Summary

- The Executive Summary highlights TNMP's reported achievements for 2021 and TNMP's plans for achieving its 2022 and 2023 projected energy efficiency savings goals.

Energy Efficiency Plan

- Section I describes TNMP's program portfolio. It details how each program will be implemented, discusses related informational and outreach activities, and provides an introduction to any programs not included in TNMP's previous EEPR.
- Section II presents TNMP's projected energy efficiency savings for the prescribed planning period broken out by program for each customer class.
- Section III describes TNMP's proposed energy efficiency budgets for the prescribed planning period broken out by program for each customer class.

Energy Efficiency Report

- Section IV documents TNMP's actual weather-adjusted demand savings goals and energy targets for the previous five years (2017-2021).
- Section V compares TNMP's projected energy and demand savings to its reported and verified savings by program for calendar years 2020 and 2021.
- Section VI documents TNMP's incentive and administration expenditures for the previous five years (2017-2021) broken out by program for each customer class.
- Section VII compares TNMP's actual program funding for 2021 compared to its 2022 budget broken out by program for each customer class.
- Section VIII describes the results from TNMP's MTPs.
- Section IX reports on Research & Development and Administration Costs.
- Section X details TNMP's current EECRF, collection, and future filing.
- Section XI reflects TNMP revenue collection through the 2021 EECRF.
- Section XII breaks out the over/under-recovery of energy efficiency program costs.

Acronyms

Glossary

Appendix

- Reported kW and kWh Savings broken out by county for each program.

Executive Summary

The Energy Efficiency Plan ("The Plan") details TNMP's plan to achieve the required demand savings reduction, as determined by the Final Order in Docket No. 52153, by December 31, 2022.

The annual demand goal for energy efficiency savings pursuant to 16 TAC § 25.181(e)(1)(C) is calculated by applying the percentage goal to the utility's summer weather-adjusted five-year average peak demand for the combined residential and commercial customers. As shown by the data in **Table 4**, a four-tenths of 1% goal would be 5.3 MW, which is less than the amount of energy efficiency to be acquired for the most recent preceding year. Therefore, for 2023, TNMP has planned to achieve a goal of 5.44 MW.

The Plan also addresses the corresponding energy savings goal of 9,531 MWh, which is calculated from the demand savings goal using a 20% conservation load factor.

The goals, budgets, and implementation plans included in The Plan are designed to: 1) comply with requirements of the EE Rule; 2) incorporate results and recommendations included in the Annual Statewide Portfolio Evaluation, Measurement, and Verification Report by the Evaluation, Measurement and Verification ("EM&V") contractor; 3) consider lessons learned regarding energy efficiency service providers; 4) evaluate other ERCOT distribution utilities' results; 5) reflect the effects of economic factors; and 6) enable customer participation in the various energy efficiency programs.

The Energy Efficiency Report ("The Report") demonstrates TNMP's successful 2021 implementation of its energy efficiency portfolio of SOPs and MTPs, as required by PURA § 39.905. These programs met and exceeded TNMP's efficiency savings goals by procuring 11.693 MW in demand savings and 19,182 MWh in energy savings. The 2021 TNMP portfolio included the Residential and Hard-to-Reach Standard Offer Programs, and High-Performance Homes Market Transformation Program, as well as the SCORE/CitySmart, Commercial Solutions, and Open Small Business Market Transformation Programs, the Load Management Standard Offer Program and Low Income Weatherization Program.

A summary of annual goals and budgets is presented in **Table 1**.

Table 1: Summary of Goals, Projected Savings, and Projected Budgets[1]

Calendar Year	0.4% Peak Demand Goal	Peak Demand (MW) Goal[2]	Energy (MWh) Goal	Projected Demand Savings (MW)	Projected Energy Savings (MWh)	Projected Budget ('000's)
2022	5.2	5.44	9,531	10.285	15,100	$4,911
2023	5.3	5.32	9,321	11.606	13,755	$5,460

In order to obtain the goal, TNMP proposes to implement the following standard offer and market transformation programs:

- Open Small Business MTP
- SCORE/CitySmart MTP
- Commercial Solutions MTP
- Load Management SOP
- High-Performance Homes MTP
- Residential SOP
- Hard-to-Reach SOP
- Low Income Weatherization

Energy Efficiency Plan

I. 2022 Programs

A. 2022 Program Portfolio

TNMP plans to implement eight SOPs and MTPs. These programs have been structured to comply with the rules governing program design and evaluation in 16 TAC § 25.181(h), (i), (j), and (k). Each of these programs target both broad market segments and specific market sub-segments that offer significant opportunities for cost-effective savings. TNMP anticipates that targeted outreach to a broad range of service provider types will be necessary in order to meet the savings goals required by PURA § 39.905 on a continuing basis.

Table 2 (a) summarizes the programs and target markets.

[1] 0.4% Peak Demand Goal numbers are calculated from Table 4; Peak Demand Goal was established in Docket No.52153; Projected Savings are from Table 5; and Projected Budget from Table 6. All MW and MWh figures in this Table are given "at Meter."

[2] Includes the effects of industrial opt-outs, as defined in 16 TAC § 25.181(u).

Table 2 (a): 2022 Energy Efficiency Program Portfolio

Programs	Target Market	Application
Open Small Business MTP	Commercial <200kW	Retrofit
SCORE/CitySmart MTP	Schools, Government	Retrofit; New Construction
Commercial Solutions MTP	Commercial >200kW	Retrofit; New Construction
Load Management SOP	Commercial	Load Management
High-Performance Homes MTP	Residential	New Construction
Residential SOP	Residential	Retrofit
Hard-to-Reach SOP	Residential Income-qualified	Retrofit
Low Income Weatherization	Residential Income-qualified	Retrofit

TNMP maintains a website containing the requirements for project participation, forms required for project submission, and the links to databases containing the current available funding at TNMPefficiency.com. This website will be the primary method of communication used to provide potential project sponsors ("Project Sponsors") for the energy efficiency projects with program updates and information. **Table 2 (b)**, lists the links for all Program Manuals.

Table 2 (b): 2022 Energy Efficiency Program Manuals

Programs	Program Manuals
Open Small Business MTP	https://tnmpefficiency.com/downloads/2022/TNMP%20Open%20Small%20Business%20Program%20Manual%20-%202022.pdf
SCORE/CitySmart MTP	https://tnmpefficiency.com/downloads/2022/TNMP%20SCORE%20CitySmart%20Program%20Manual%20-%202022.pdf
Commercial Solutions MTP	https://tnmpefficiency.com/downloads/2022/TNMP%20ComSol%20Program%20Manual%20-%202022.pdf
Load Management SOP	https://tnmpefficiency.com/commercial.php#load-management
High-Performance Homes MTP	https://tnmpefficiency.com/downloads/2022/2022%20TNMP%20HPH%20Program%20Guide.pdf
Residential SOP	https://tnmpefficiency.com/downloads/2021/11/2022%20RESHTR%20Program%20Manual.pdf
Hard-to-Reach SOP	https://tnmpefficiency.com/downloads/2021/11/2022%20RESHTR%20Program%20Manual.pdf
Low Income Weatherization	https://www.tnmpefficiency.com/downloads/2022/2022_TNMP_LIW_Manual.pdf

B. Existing Programs

Open Small Business MTP ("Open MTP")

Program Design

Although TNMP's Commercial Solutions program has successfully engaged larger customers and contractors to install energy efficiency projects, the program encountered additional barriers for small business customer participation. Since these customers do not typically engage in energy efficiency projects, the contractor community does not market to them as actively as larger customers. As a result, many small commercial customers do not participate in programs, and thus do not benefit from energy efficiency programs.

Implementation Process

TNMP continues to contract with CLEAResult as the implementer to provide the energy efficiency and demand reduction design and solutions for the Open MTP throughout the 2022 program year. Under this program, TNMP helps small commercial customers that do not have the in-house capacity or expertise to: 1) identify, evaluate, and undertake efficiency improvements to their completion; 2) properly evaluate energy efficiency proposals from vendors; and/or 3) understand how to leverage energy savings to finance projects within their financial planning processes. Small-sized customers (<200 kW) tend to implement smaller projects with lower savings which creates program cost-effectiveness challenges to providing one-on-one technical assistance to this market. The Open MTP provides the direct support, tools, and training necessary to contractors to pursue small commercial customers.

Outreach Activities

The program targets small commercial customers based on premise demand. All commercial customer premises with a peak annual billing demand less than 200 kW are eligible for the program. TNMP leverages service providers to serve these customers.

SCORE/CitySmart MTP ("SCORE/CitySmart MTP")

Program Design

TNMP implemented the energy-smart schools and cities market transformation program in 2008, as envisioned by Texas 79th Legislature's Senate Bill 712 and approved by the Public Utility Commission of Texas ("Commission" or "PUCT").

The SCORE/CitySmart MTP provides energy efficiency and demand reduction solutions for schools and local government customers. The program is designed to help educate and assist these customers in lowering their energy use by facilitating the integration of energy efficiency into their short and long term planning, budgeting, and operational practices.

Implementation Process

TNMP continues its contract with CLEAResult as the implementer to offer participation to school districts and government entities in its service territory. The program facilitates the identification of potential demand and energy savings opportunities, general operating characteristics, long-range energy efficiency planning, and overall measure and program acceptance by the targeted customer participants.

Outreach Activities

TNMP markets the availability of this program in the following manner:

- Contracts with a third-party implementer to conduct outreach and planning activities;
- Targets a number of customer participants;
- Participates in regional outreach activities as may be necessary; and
- Attends appropriate industry-related meetings to generate awareness and interest.

Commercial Solutions MTP ("CS MTP")

Program Design

TNMP began implementing the CS MTP in 2010 as part of the SCORE/CitySmart MTP, as envisioned by Texas 79th Legislature's Senate Bill 712 and approved by the PUCT. TNMP's CS MTP targets commercial customers (other than local government entities and schools) who do not have the in-house capacity or expertise to: 1) identify, evaluate, and undertake efficiency improvements; 2) properly evaluate energy efficiency proposals from vendors; and/or 3) understand how to leverage their energy savings to finance projects. Incentives are paid to customers served by TNMP for eligible energy efficiency measures that are installed in new or retrofit applications resulting in savings as defined by the Texas Technical Reference Manual ("TRM").

Implementation Process

TNMP continues its contract with CLEAResult as implementer to target a number of commercial customers meeting the program participation parameters. The CS MTP facilitates the identification

of demand and energy savings opportunities, general operating characteristics, long-range energy efficiency planning, and overall measure and program acceptance by the targeted customer participants.

The CS MTP provides energy efficiency and demand reduction solutions to TNMP's larger commercial customers.

Outreach Activities

TNMP markets the availability of this program in the following manner:

- Contracts with a third-party implementer to conduct outreach and planning activities;
- Targets a number of customer participants;
- Participates in regional outreach activities as may be necessary; and
- Attends appropriate industry-related meetings to generate awareness and interest.

Load Management Standard Offer Program

Program Description

The TNMP Load Management Standard Offer Program ("SOP") was launched in 2009 in accordance with 16 TAC § 25.181, which authorizes participating Project Sponsors (customers or third-party sponsors) to provide on-call, voluntary curtailment of electric consumption during peak demand periods in return for incentive payments. Incentives are based on verified demand savings that occur at TNMP distribution sites, or at eligible institutional customers' sites, as a result of calls for curtailment. Customers are not required to produce a specific level of curtailed load but will only receive payments for the lesser of the amount of curtailed load produced or contracted.

Implementation process

Implementation of this program will be directly through customers and third-party entities representing customers at distribution level within the TNMP service territory. In 2022, the program will continue to initiate a maximum number of five curtailments, including one annual Scheduled Curtailment of one-to-two hours duration and a maximum of four Unscheduled Curtailments of one-to-four hours duration each.

Outreach Activities

TNMP plans to market the availability of the program in the following manner:

- Utilizes mass electronic mail (e-mail) notifications to keep potential participants interested and informed; and
- Maintain program information on the company website.

High-Performance Homes MTP ("HPH MTP")

Program design

The High-Performance Homes program promotes the construction and certification of new ENERGY STAR® certified and High-Performance qualified homes. This voluntary program provides financial incentives and other types of assistance to production and custom homebuilders who construct homes within the TNMP service territory that meet High-Performance specifications. To be eligible for participation, homes must achieve at least a five percent (5%) kWh savings over the Texas Baseline Reference Home (TBRH) established by the PUCT in the TRM for Program Year 2022. The Rater's primary responsibility is to work with homebuilders to facilitate the construction of ENERGY STAR® certified and High-Performance homes that meet the performance requirements for the program. For 2022, the program design continues to include an HVAC midstream portion of the program to include smaller home builders. The incentives are paid to the homebuilders that install high efficiency HVAC systems in newly constructed homes.

Implementation process

TNMP continues its contract with ICF to implement the HPH MTP, whereby any eligible builder may submit an application for a home meeting the requirements. The program information on TNMP's website reflects eligibility requirements.

Outreach Activities

TNMP markets the availability of its programs in the following manner:

- Contracts with third-party implementer to conduct outreach and planning activities;
- Utilizes mass electronic mail (e-mail) notifications to keep potential builders interested and informed;
- Maintains a website with detailed builder eligibility, incentives, and process; and
- Participates in statewide outreach activities, as may be available.

Residential Standard Offer Program ("RES SOP")

Program Design

The RES SOP targets residential customers whose maximum demand is less than 100 kW. Incentives are paid to Project Sponsors for certain eligible measures installed in retrofit applications which provide verifiable demand and energy savings. Incentives are paid to Project Sponsors for eligible measures installed in retrofit applications as defined in the Texas TRM.

Implementation Process

TNMP continues implementation of its RES SOP whereby any eligible Project Sponsor may submit an application to participate. The program information on TNMP's website is updated to reflect participating Project Sponsors and incentive amounts that are available.

Additionally, TNMP has carved out a portion of incentives and contracted with CLEAResult to implement a high-performance a/c tune-up measure.

Outreach Activities

TNMP markets the availability of its programs in the following manner:

- Utilizes mass electronic mail (e-mail) notifications to keep potential Project Sponsors interested and informed;
- Maintains a website with detailed project eligibility, end-use measures, incentives, procedures, and application forms;
- Participates in statewide outreach activities as may be available; and
- Conducts ongoing meetings as necessary to explain elements such as responsibilities of the Project Sponsor, project requirements, incentive information, and the application and reporting process.

Hard-To-Reach Standard Offer Program ("HTR SOP")

Program Design

The HTR SOP targets low income customers, defined as a household income at or below 200% of the federal poverty guidelines, or who meet certain other qualifications. Incentives are paid to Project Sponsors for eligible measures installed in retrofit applications as defined in the Texas TRM.

Implementation Process

TNMP continues implementation of its HTR SOP, whereby any eligible Project Sponsor may submit an application to participate. The program information on TNMP's website is updated to

reflect participating Project Sponsors and the program database reflects incentive amounts that are available. Additionally, TNMP has carved out a portion of incentives and contracted with CLEAResult to implement a high-performance a/c tune-up measure.

Outreach Activities

TNMP markets the availability of its programs in the following manner:

- Utilizes mass electronic mail (e-mail) notifications to keep potential Project Sponsors interested and informed;
- Maintains a website with detailed project eligibility, end-use measures, incentives, procedures and application forms;
- Participates in statewide outreach activities, as may be available; and
- Conducts ongoing meetings as necessary to explain elements such as responsibilities of the Project Sponsor, project requirements, incentive information, and the application and reporting process.

Low Income Weatherization Program

Program Design

Each unbundled transmission and distribution utility shall include in its energy efficiency plan a targeted low income energy efficiency program as described by PURA § 39.903(f)(2). The Low Income Weatherization Program targets TNMP's low income residential customers who: a) meet the Department of Energy's income eligibility guidelines, defined as at or below 200% of the federal poverty level; b) are connected to TNMP's electric system; and c) have been qualified through the Service Providers guidelines. Effective in 2011, S.B. 1434 required that no less than 10% of the total energy efficiency portfolio budget be expended on Low Income Weatherization.

Implementation Process

TNMP continues to contract with Frontier Energy (Frontier) to provide marketing and education to agencies for single family homes. Frontier contracts with the agencies (i.e. low income advocates) to provide weatherization services to eligible single family residential TNMP customers.

The agencies select measures to be installed based on the savings-to-investment ("SIR") ratio, which evaluates cost-effectiveness using the present value of the measure's lifetime energy savings divided by the installation costs. Agencies receive payment for the measure installation costs, plus an administrative fee of 8%, and up to the maximum allowable expenditure of $7,541 per home. Energy savings are defined in the Texas TRM. Eligible measures include, but are not limited to:

- Attic insulation
- Central AC replacement
- Infiltration control
- Solar screens
- Wall insulation

Additionally, TNMP contracts with EnerChoice LLC (EnerChoice) to reach the multifamily market through a competitive bidding process. EnerChoice issues a request for proposal through which service providers identify potential multifamily projects and submit bids for heating, ventilation and air conditioning (HVAC) system change outs.

Outreach Activities

Low income advocates throughout TNMP's service territory will be called upon to participate. Database training and updates to policies and procedures will take place annually, or as needed.

C. New Programs

There are no new programs for 2022.

D. Customer Classes

Customer classes targeted by TNMP's energy efficiency programs are the Commercial, Hard-to-Reach, and Residential classes.

The annual demand goal will be allocated to customer classes by examining historical program results, evaluating economic trends, and considering 16 TAC § 25.181, which states that no less than 5% of the utility's total demand goal should be achieved through programs for hard-to-reach customers. **Table 3** summarizes the number of customers in each of the eligible customer classes, which was used to allocate funding on an equitable basis.

It should be noted, however, that the actual distribution of the goal and budget must remain flexible based upon the response of the marketplace, the potential interest that a customer class may have toward a specific program, and the overriding objective of meeting the legislative goal. TNMP will offer a portfolio of Standard Offer and Market Transformation Programs that will be available to all customer classes.

Table 3: Summary of Customer Classes

Customer Class	Number of Customers
Commercial	44,568
Residential	151,556
Hard to Reach	69,371

II. Projected Energy Efficiency Savings and Goals

The modified PURA § 39.905, effective September 1, 2011, changed the calculation used to determine TNMP's goal, stating that for an electric utility whose amount of energy efficiency to be acquired under this subsection is equivalent to at least four-tenths of 1% of the electric utility's summer weather-adjusted peak demand for residential and commercial customers in the previous calendar year, the minimum goal shall not be less than four-tenths of 1% of the utility's summer weather-adjusted peak demand for residential and commercial customers, adjusted for distribution industrial opt-out, by December 31 of each subsequent year; and the amount of energy efficiency to be acquired for the utility's residential and commercial customers for the most recent preceding year.

As shown in the data in **Table 4**, a four-tenths of 1% goal would be 5.3 MW for 2023, which is less than the amount of energy efficiency to be acquired for the most recent preceding year. For 2022, TNMP has planned to achieve a goal of 5.44 MW,[3] and for 2023 TNMP has planned to achieve a goal of 5.44 MW.[4]

Table 4 presents historical annual growth in demand for the previous five years that is used to calculate demand and energy goals. **Table 5** presents the projected demand and energy savings broken out by program for each customer class for 2022 and 2023. Projected savings for 2022 and 2023 reflect the budget allocations designed to meet TNMP's goals required by PURA § 39.905.

[3] Goal defined in Docket No. 52153.
[4] 16 TAC § 25.181(e)(1)(D) states that a utility's demand goal cannot be lower than its prior year's goal.

Table 4: Annual Growth in Demand and Energy Consumption

	Peak Demand (MW) @ Source					Energy Consumption (MWh) @ Meter						Peak Demand (MW) @ Source		Peak Demand (MW) For Goal @ Meter		
	Total System		Residential & Commercial			Total System		Residential & Commercial				Residential & Commercial		Residential & Commercial		
Calendar Year	Actual	Weather Adjusted	Actual	Weather Adjusted	Opt-Out	Actual	Weather Adjusted	Actual	Weather Adjusted	Opt-Out	Net	Unadjusted Load	0.4% Peak Unadjusted Demand	T&D Loss Factor %	Adjusted Load	0.4% Peak Demand
(a)	(b)[5]	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)[6]	(o)	(p)	(q)
2017	1,737	1,739	1,407	1,408	-21	9,148,760	9,281,843	6,034,732	6,167,815	-129,138	6,038,677	1,387	5.4	6.48%	1,297	5.1
2018	1,881	1,801	1,467	1,388	-29	10,071,002	9,994,163	6,483,278	6,406,439	-241,898	6,164,541	1,359	5.4	6.54%	1,301	5.1
2019	1,965	1,930	1,512	1,477	-31	10,833,183	10,781,626	6,639,247	6,587,690	-282,289	6,305,401	1,446	5.52	6.33%	1,360	5.2
2020	2,038	2,006	1,453	1,421	-52	11,433,155	11,459,453	6,575,549	6,601,848	-483,838	6,118,010	1,369	5.53	5.28%	1,300	5.2
2021	2,009	2,074	1,464	1,528	-33	11,802,912	11,804,111	6,562,989	6,564,188	-277,454	6,286,734	1,495	5.64	5.30%	1,420	5.3

[5] The columns (b) and (m) represent actual ERCOT settlement data for TNMP's service territory for the coincident peak for each year that was included in the four coincident peaks approved by the Commission for the ERCOT wholesale transmission matrix.

[6] Deemed actual distribution loss factors used in the ERCOT settlement process which are calculated from the distribution loss coefficients submitted by DSPs and the ERCOT actual load + deemed actual transmission loss factors used in the ERCOT settlement process which are calculated based upon a linear interpolation or extrapolation using the on-peak and off-peak TLFs corresponding to the actual ERCOT system load (http://www.ercot.com/mktinfo/data_agg).

Table 5: Projected Demand and Energy Savings Broken Out by Program for Each Customer Class (at Meter)[7]

	2022	
Customer Class and Program	Demand Goal (kW)	Energy Goal (kWh)
Commercial	**7,000**	**7,771,718**
Open Small Business MTP	450	1,356,365
SCORE/CitySmart MTP	680	2,433,013
Commercial Solutions MTP	870	3,977,340
Load Management SOP	5,000	5,000
Residential	**2,284**	**5,432,606**
High-Performance Homes MTP	446	1,047,032
Residential SOP	1,838	4,385,574
Hard-to-Reach	**1,001**	**1,895,466**
Hard-to-Reach SOP	483	956,260
Low Income Weatherization	518	939,206
Total Annual Projected Savings	**10,285**	**15,099,790**
	2023	
Customer Class and Program	Demand Goal (kW)	Energy Goal (kWh)
Commercial	**8,508**	**7,937,602**
Open Small Business MTP	677	1,583,189
SCORE/CitySmart MTP	920	2,946,955
Commercial Solutions MTP	814	3,401,361
Load Management SOP	6,098	6,098
Residential	**2,176**	**4,424,979**
High-Performance Homes MTP	566	1,187,366
Residential SOP	1,611	3,237,613
Hard-to-Reach	**921**	**1,392,891**
Hard-to-Reach SOP	476	797,363
Low Income Weatherization	445	595,527
Total Annual Projected Savings	**11,606**	**13,755,472**

[7] The projected savings in Table 5 for 2022 are based on the Statements of Work in place for 2022. The projected savings in Table 5 for 2023 are based on the cost/kW from 2021 used to estimate future achievement assuming that achievement of savings would be from the exact same measure-mix as in 2021. Historically, program funds are evaluated and reallocated as necessary among programs throughout the year, so it is highly likely that the actuals will differ from the projections.

III. Program Budgets

Table 6 presents total proposed budget allocations required to achieve the projected demand and energy savings shown in Table 5. The budget allocations are defined by the overall projected demand and energy savings, the avoided costs of capacity and energy in 16 TAC § 25.181, allocation of demand goals among customer classes, and the incentive levels by customer class. The budget allocations presented in Table 6 below are broken down by customer class, program, and the different budget categories: incentive payments, administration, research and development ("R&D") and EM&V.

TNMP's budget projections are designed to exceed the goal as encouraged by 16 TAC § 25.181(d), while staying within the cost caps established by 16 TAC § 25.182(d)(7). TNMP uses a historical estimate to project achievements, which does not account for other variables that would lower savings, in an attempt to still meet the goal. 16 TAC § 25.181(d) encourages TNMP to achieve demand reduction and energy savings through a portfolio of cost-effective programs that exceed each utility's energy efficiency goals while staying within the cost caps. TNMP's budget is designed to meet or exceed the goal established by Docket No. 52153 while remaining within the required cost caps.

Table 6: Proposed Annual Budget Broken Out by Program for Each Customer Class

2022	Incentives	Admin	R&D	Total Budget	EM&V[8]
Commercial	**1,698,181**	**194,440**	**40,948**	**1,933,569**	
Open Small Business MTP	409,312	38,021	9,870	457,203	
SCORE/CitySmart MTP	467,561	55,455	11,274	534,289	
Commercial Solutions MTP	621,309	78,862	14,982	715,152	
Load Management SOP	200,000	22,102	4,823	226,925	
Residential	**1,574,316**	**327,259**	**37,961**	**1,939,537**	
High-Performance Homes MTP	375,000	47,970	9,042	432,013	
Residential SOP	1,199,316	279,289	28,919	1,507,524	
Hard-to-Reach	**840,100**	**177,051**	**20,257**	**1,037,408**	
Hard-to-Reach SOP	350,100	79,564	8,442	438,106	
Low Income Weatherization	490,000	97,487	11,815	599,302	
Total Budgets by Category	**$4,112,597**	**$698,750**	**$99,167**	**$4,910,514**	**$57,176**
2023	**Incentives**	**Admin**	**R&D**	**Total Budget**	**EM&V**
Commercial	**2,000,000**	**214,362**	**49,150**	**2,263,513**	
Open Small Business MTP	550,000	49,651	11,388	611,039	
SCORE/CitySmart MTP	600,000	61,586	14,126	675,712	
Commercial Solutions MTP	600,000	80,537	18,473	699,010	
Load Management SOP	250,000	22,589	5,163	277,752	
Residential	**1,650,000**	**378,785**	**52,185**	**2,080,969**	
High-Performance Homes MTP	500,000	54,050	12,397	566,447	
Residential SOP	1,150,000	324,735	39,787	1,514,522	
Hard-to-Reach	**865,000**	**225,826**	**24,514**	**1,115,340**	
Hard-to-Reach SOP	375,000	78,799	9,655	463,454	
Low Income Weatherization	490,000	147,027	14,860	651,887	
Total Budgets by Category	**$4,515,000**	**$818,973**	**$125,849**	**$5,459,822**	**$52,421**

[8] EM&V numbers reported are calendar year amounts.

IV. Historical Demand Savings Goals and Energy Targets for Previous Five Years

This section documents TNMP's actual demand goals and energy targets for the previous five years (2017-2021).

Table 7: Historical Demand and Energy Savings Goals and Achievements (at the Meter)[9]

Calendar Year	Actual Demand Goal (MW)	Actual Energy Goal (MWh)	Actual Demand Reduction (MW)	Actual Energy Savings (MWh)
2021	5.44	9,531	11.693	19,182
2020	5.44	9,531	12.469	16,802
2019	5.53	9,689	10.432	15,624
2018	5.61	9,829	13.764	17,204
2017	5.68	9,951	10.684	20,763

[9] Actual demand reduction at source for 2021 is 12.347 MW using the T&D loss factor from 2021 in Table 4. The calculation is as follows: 11.693 MW at meter * (1/(1-5.3% line losses)) = 12.347 MW at source.

V. Projected, Reported and Verified Demand and Energy Savings

Table 8: Projected versus Reported and Verified Savings for 2021 and 2020 (at Meter)

2021	Projected Savings[10]		Reported Savings[11]	
Customer Class and Program	kW	kWh	kW	kWh
Commercial	**6,185**	**6,731,163**	**7,559**	**9,996,090**
Open Small Business MTP	646	1,816,196	571	1,577,735
SCORE/CitySmart MTP	634	1,982,931	886	3,354,059
Commercial Solutions MTP	643	2,919,188	1,024	5,059,218
Load Management SOP	4,263	12,848	5,078	5,078
Residential	**3,388**	**5,979,493**	**2,993**	**7,166,928**
High-Performance Homes MTP	638	1,443,640	569	1,410,848
Residential SOP	2,751	4,535,853	2,424	5,756,081
Hard-to-Reach	**900**	**1,491,212**	**1,141**	**2,019,091**
Hard-to-Reach SOP	517	862,262	536	1,061,828
Low Income Weatherization	382	628,950	606	957,262
Total Annual Goals	**10,473**	**14,201,868**	**11,693**	**19,182,109**
2020	Projected Savings		Reported and Verified Savings[12]	
Customer Class and Program	kW	kWh	kW	kWh
Commercial	**6,500**	**8,337,895**	**7,286**	**7,955,580**
Open Small Business MTP	450	1,700,000	465	1,005,413
SCORE/CitySmart MTP	685	2,931,532	681	2,404,036
Commercial Solutions MTP	865	3,701,863	1,136	4,541,127
Load Management SOP	4,500	4,500	5,004	5,004
Residential	**3,314**	**5,921,143**	**4,111**	**7,190,083**
High-Performance Homes MTP	512	1,345,980	509	1,275,835
Residential SOP	2,801	4,575,163	3,602	5,914,248
Hard-to-Reach	**896**	**1,395,779**	**1,072**	**1,656,102**
Hard-to-Reach SOP	531	816,993	681	1,112,985
Low Income Weatherization	366	578,786	391	543,117
Total Annual Goals	**10,710**	**15,654,818**	**12,469**	**16,801,764**

[10] Projected Savings for 2021 as reported in the EEPR filed in Project No. 51672.

[11] Program savings have not been verified with EM&V.

[12] Program savings have been verified with EM&V.

VI. Historical Program Expenditures

This section documents TNMP's incentive, administration, R&D, and EM&V[13] expenditures for the previous five years (2017-2021) broken out by program for each customer class.

Table 9: Historical Program Incentive and Administration Expenditures for 2017 through 2021[14]

	2021				2020			2019			
	Incent.	Admin	R&D	EM&V	Incent.	Admin	EM&V	Incent.	Admin	R&D	EM&V
Commercial	**1,786,562**	**162,057**	**25,294**	**34,502**	**1,645,202**	**157,802**	**28,886**	**1,589,671**	**181,833**	**50,245**	**29,705**
Open Small Business MTP	413,956	37,536	5,861	4,439	320,816	30,857	6,920	422,913	48,375	13,367	6,090
SCORE/CitySmart MTP	513,468	46,559	7,270	12,240	467,912	45,005	7,952	451,995	51,701	14,286	7,262
Commercial Solutions MTP	671,468	60,886	9,507	13,617	665,417	64,002	10,641	571,545	65,376	18,065	11,402
Load Management SOP	187,669	17,077	2,657	4,207	191,057	17,937	3,374	143,218	16,382	4,527	4,951
Residential	**1,896,857**	**286,359**	**26,856**	16,186	**1,825,252**	**265,595**	**21,448**	**1,467,051**	**274,201**	**46,369**	**21,020**
High-Performance Homes MTP	450,633	40,861	6,380	3,806	414,670	38,931	8,368	254,205	29,077	8,035	7,443
Residential SOP	1,446,224	245,498	20,476	12,379	1,410,582	226,664	13,080	1,212,846	245,124	38,335	10,143
REP Pilot MTP											3,434
Hard-to-Reach	**891,069**	**170,723**	**12,616**	5,295	**817,737**	**143,690**	**7,989**	**943,716**	**198,043**	**29,828**	**6,621**
Hard-to-Reach SOP	350,936	59,572	4,969	2,860	401,849	64,572	4,240	323,984	55,308	10,240	4,543
Low Income Weatherization	540,133	111,152	7,647	2,434	415,889	79,118	3,749	619,733	142,735	19,588	2,078
Total Annual Expenditures	**4,574,488**	**619,140**	**64,766**	**55,983**	**4,288,191**	**567,088**	**58,323**	**4,000,438**	**654,077**	**126,442**	**57,346**

[13] EM&V actual expenditures are allocated based on allocation factors provided by the EM&V contractor.

[14] 2021 budget found at Table 10 in the current EEPR; 2020 budget defined in Project No.51672; 2019 budget defined in Project No. 50666.

Table 9 Continued[15]

	2018				2017			
	Incent.	Admin	R&D	EM&V	Incent.	Admin	R&D	EM&V
Commercial	**1,710,181**	**166,898**	**24,622**	**24,583**	**1,553,697**	**143,269**	**34,510**	**31,671**
Open Small Business MTP	438,203	42,764	6,309	3,647	367,728	33,372	8,168	5,218
Commercial Solutions MTP	406,338	60,456	8,919	8,550	472,319	42,864	10,491	11,069
SCORE/CitySmart MTP	619,490	39,655	5,850	9,736	567,691	51,519	12,609	10,093
Load Management SOP	246,150	24,022	3,544	2,650	145,960	15,513	3,242	5,291
Residential	**1,728,041**	**270,581**	**24,879**	**22,618**	**1,833,197**	**293,270**	**40,718**	**17,097**
High-Performance Homes MTP	399,946	39,031	5,758	4,438	373,039	33,854	8,286	4,719
Residential SOP	1,214,261	220,441	17,482	13,359	1,314,981	246,240	29,208	10,465
Efficiency Connection MTP	113,834	11,109	1,639	4,821	35,241	3,198	783	1,913
CoolSaver Pilot					109,935	9,977	2,442	
Hard-to-Reach	**846,030**	**167,063**	**12,181**	**9,090**	**825,122**	**152,942**	**18,327**	**5,490**
Hard-to-Reach SOP	349,988	63,538	5,039	5,732	299,747	46,888	6,658	3,123
Low Income Weatherization	496,042	103,525	7,142	3,358	525,375	106,054	11,669	2,367
Research & Development			**128,000**				**128,000**	**2,033**
Energy Education Program			128,000				128,000	2,033
Total Annual Expenditures	**4,284,252**	**604,541**	**189,682**	**56,291**	**4,212,016**	**589,481**	**221,555**	**56,291**

[15] 2018 budget defined in Project No. 49297; 2017 budget defined in Project No. 48146.

VII. Program Funding for Calendar Year 2021

As shown in **Table 10**, TNMP spent a total of $5,258,394.02, not including EM&V costs, on all of its energy efficiency programs in 2021 to meet the Commission & PURA's mandated budget. The total forecasted budget for 2021 was $5,417,365.

Funds for achieving the energy efficiency goal will be collected in each utility's EECRF. Each utility shall track its energy efficiency expenditures separately from other expenditures and report these in their annual energy efficiency report.

Table 10: Program Funding for Calendar Year 2021

	Total Projected Budget	Actual Funds Expended (Incentives)	Actual Funds Expended (Admin)[1]	Actual Funds Expended (R&D)	Total Funds Expended	Funds Remaining	% change[2]
Commercial	**2,028,841**	**1,760,409**	**162,057**	**25,294**	**1,973,913**	**54,927**	**24%**
Open Small Business MTP	499,420	428,007	37,536	5,861	457,352	42,067	8%
SCORE/CitySmart MTP	535,011	458,688	46,559	7,270	567,297	-32,285	-6%
Commercial Solutions MTP	720,226	623,715	60,886	9,507	741,861	-21,635	-3%
Load Management	274,184	250,000	17,077	2,657	207,403	66,781	24%
Residential	**2,276,627**	**1,896,004**	**286,359**	**26,856**	**2,210,072**	**66,555**	**3%**
High-Performance Homes	492,822	449,897	40,861	6,380	497,875	-5,053	-1%
Residential SOP	1,783,805	1,446,107	245,498	20,476	1,712,198	71,607	4%
Hard-to-Reach	**1,111,897**	**840,000**	**170,723**	**12,616**	**1,074,408**	**37,489**	**7%**
Hard-to-Reach SOP	427,504	350,000	59,572	4,969	415,476	12,028	3%
Low Income Weatherization	684,394	490,000	111,152	7,647	658,932	25,461	4%
Total Annual Expenditures	**5,417,365**	**4,496,413**	**619,140**	**64,766**	**5,258,394**	**158,971**	**33%**
EM&V					**55,983**		

TNMP's 2021 targeted low income program met the requirements in the EE Rule, whereby "annual expenditures for the targeted low income energy efficiency program are not less than 10% of the utilities energy efficiency budget for the program year" as detailed in **Table 11** below:

Table 11: Meeting Low Income Weatherization Expenditure Requirement

2021 Total Expenditures	LIW Expenditures	% of Expenditures
$5,258,394	$658,932	12.53%

VIII. Market Transformation Program Results

Open Small Business MTP (Open MTP)

TNMP retained CLEAResult in 2013 to broaden participation in the commercial sector to include more small business customers. Open MTP is a program designed to offer contractor and customer education on energy efficiency technologies, equip participating contractors with the tools they need to succeed in generating revenue from projects in the small business market, and offer substantial incentive rates needed to move small (≤200 kW peak demand) businesses to install energy efficient products such as high efficiency lighting and refrigeration measures. In 2019, air infiltration was included as a "no cost" measure and made up over ½ of the savings achieved. Customers leveraged "no cost" measures including a "no cost" a/c tune-up that was added in 2021, as small businesses still didn't have much money to spend on other measures due to the effects COVID-19. The program overcomes market barriers by providing incentives to help pay for energy efficiency upgrades. In addition, Open MTP connects customers with participating contractors that are qualified to provide design and installation services for energy efficient technologies and any additional technical support as needed to make the customer comfortable with the implementation of efficiency measures in their facilities.

The program design is a contractor direct install model enabling market transformation at the contractor and customer level. The program is based on contractor engagement and furthermore provides a Proposal Generation Software Application ("Proposal App") to empower participating contractors and to streamline program participation. The Proposal App enables participating contractors to perform facility surveys for eligible measures, generate and submit Customer Proposals and obtain electronic customer signature. The program focuses on educating and training participating contractors to provide customer support and will provide direct customer assistance as needed.

In 2021, TNMP projected acquisition of 450 kW demand savings from this program. TNMP is reporting 571 kW. This includes 596 projects in six counties.

SCORE/CitySmart MTP

TNMP retained CLEAResult to offer the SCORE/CitySmart MTP in 2009 to schools and local government sectors. The program was designed to overcome obstacles to energy efficiency projects such as the institutional disconnect between the finance and facilities departments, the lack of firsthand experience with efficiency measures, limited budgets, and the lack of management decision-making processes necessary for identifying, prioritizing, and completing projects that will improve energy performance and reduce operating costs. The 2021 SCORE/CitySmart MTP continued to provide non-cash incentives such as building energy analysis (benchmarking), energy master planning seminars, technical assistance, communications support, and monetary incentives for the installation of documented energy efficiency measures that reduce peak demand and energy use, and added a Small Cities incentive increase to compliment the Small Schools incentive increase enabling more customer participation.

The SCORE/CitySmart MTP has created change that can be tracked among partners, service providers, engineers, designers, and architects. This change has been achieved by assisting participants to identify energy efficiency opportunities, make informed financial decisions, successfully install energy-saving projects in their facilities and provide Press Releases to promote accomplishments. In fact, many of the program partners have not previously considered improving their facilities' energy performance. Furthermore, the SCORE/CitySmart MTP has enrolled participants that had previously been unable to participate due to various barriers including lack of time, resources, and knowledge to complete the application process. The program has been effective in educating local contractors, architects, and engineers about newer, more cost-effective and energy efficient technologies for their customers. The service provider component has been an integral part of developing long-term relationships and impact in the marketplace.

Tracking Success

Pursuant to 16 TAC § 25.181, as part of the 2009 Texas SCORE/CitySmart MTP, TNMP completed a baseline study of Texas schools and local governments. The primary objective of this study was to document the current status of energy use, key equipment, practices, and management within school and local government participants in TNMP's service territory. While the study confirmed that energy efficiency interest may not be a significant market barrier, financing, internal management and lack of energy efficiency education are all significant barriers. Many respondents noted they lack the time and procurement process to implement efficiency improvements, as well as the awareness of and familiarity

with energy efficient technologies. Given the significant monetary and non-monetary barriers present in the marketplace, both resource acquisition and market transformation programs are needed.

In 2021, TNMP projected acquisition of 680 kW demand savings from this program. TNMP is reporting 886 kW, including participation by 44 projects in seven counties.

Commercial Solutions MTP

TNMP retained CLEAResult to offer the Commercial Solutions component in 2009 to broaden program participation in commercial sectors. In 2012, TNMP separated the CS MTP from the SCORE/CitySmart MTP. The program was designed to overcome obstacles to energy efficiency projects such as the institutional disconnect between the finance and facilities departments, the lack of firsthand experience with efficiency measures, limited budgets, and the lack of management decision-making processes necessary for identifying, prioritizing, and completing projects that will improve energy performance and reduce operating costs. The 2021 CS MTP provided non-cash incentives such as technical assistance and communications support as well as monetary incentives for the installation of documented energy efficiency measures that reduce peak demand and energy use. Participation was low in Load Management, so incentives were repurposed to capture some 2020 projects that had been postponed.

Tracking Success

The CS MTP has created change that can be tracked among partners, service providers, engineers, designers, and architects. This change has been achieved by assisting participants to identify energy efficiency opportunities, make informed financial decisions, successfully install energy-saving projects in their facilities and provide Press Releases to promote accomplishments. Furthermore, the CS MTP has enrolled participants that had previously been unable to participate due to various barriers including lack of time, resources and knowledge to complete the application process. The program has been effective in educating local contractors, architects, and engineers about newer, more cost-effective and energy efficient technologies for their participants. The service provider component has been an integral part of developing long-term relationships and impact in the marketplace.

In 2021, TNMP projected acquisition of 870 kW demand savings from this program. TNMP is reporting 1,024 kW. This included 73 projects in six counties.

High-Performance Homes MTP

The primary objective of the High-Performance Homes program has been to achieve peak demand reductions and/or energy savings through increased sales of ENERGY STAR® certified and High-Performance qualified homes. Additionally, the program is designed to condition the market so that consumers are aware of and demand ENERGY STAR® certified and High-Performance qualified homes, and that builders have the technical capacity to supply them.

TNMP has retained ICF Resources (ICF) to implement the program. Pursuant with 16 TAC § 25.181, as part of the 2015 HPH MTP, ICF completed a baseline study of the residential new construction market. The primary objective of this study was to analyze and demonstrate standard construction practices do not meet the current statewide energy code. The results of the study augmented the HPH MTP by quantifying the current new home construction market, and results have been used to generate a TBRH to be used in conjunction with the 2015 IECC code to incentivize builders to comply with higher efficiency baseline.

The program continues to offer a midstream path to capture HVAC savings from new construction homes that did qualify for the whole house path.

In 2021, TNMP incentivized 738 homes, resulting in 569 kW of reduced demand and 1,410,847 kWh of energy savings.

Low Income Weatherization

In 2021, TNMP partnered with 2 agencies to provide services under the single family portion of the program and issued an RFP to provide services to the multifamily sector.

The 2021 program met the required 10% spend of the total energy efficiency budget, resulting in a savings of 606 kW and 957,262 kWh in seven counties.

IX. Research & Development and Administration Cost Reporting

Research & Development ("R&D")

R&D costs for the 2021 portfolio include the ongoing development of a tracking system. TNMP is investing in the ongoing development of an electronic reporting and tracking system to manage TNMP's energy efficiency portfolio and simplify reporting.

Administration Costs

Administration costs for the 2021 portfolio include, but are not limited to, outsourced program administration, marketing, energy efficiency employees' payroll, EUMMOT, costs associated with regulatory filings, and EM&V admin outside of the actual cost associated with the EM&V contractor. Generally, such costs benefit the entire portfolio with costs being directly assigned, where possible, to the specific program requiring such costs. Any costs (or portions thereof) which are not directly assignable to a specific program are allocated among the programs in proportion to the program incentive costs.

X. Current Energy Efficiency Cost Recovery Factor ("EECRF")

TNMP filed its Application for Approval of an Energy Efficiency Cost Recovery Factor on May 24, 2021. The application and supporting documents are available for download from the PUCT Interchange under Docket No. 52153. Rates charged per class are billed per kWh monthly:

- Residential Service = $0.001355
- Secondary Service Less than or Equal to 5kW = $0.0145080
- Secondary Service Greater than 5kW = $0.000935
- Primary Service = $0.000145
- Lighting = $0.000032

The EECRF was filed, approved, and is being collected from Jan 1 – Dec 31, 2022. Rates went into effect March 1, 2022. TNMP will be filing for 2023 EECRF recovery by June 1, 2022.

XI. Revenue Collected through EECRF (2021)

Revenue Collected

TNMP collected $5,728,585 from January 1, 2021 through December 31, 2021.

XII. Over/Under-recovery of Energy Efficiency Program Costs

TNMP had an over-recovery of $7,733[16] for the 2021 program year, including its rate case expenses of $34,335.34 for processing Docket No. 52153. TNMP will true-up this amount, by rate class, in the 2022 EECRF filing.

[16] Over-recovery amount includes a true-up to the EM&V projected costs collected through rates as approved in Docket No. 52153.

Acronyms

C&I	Commercial and Industrial
CCET	Center for the Commercialization of Electric Technologies
DR	Demand Response
DSM	Demand Side Management
EEP	Energy Efficiency Plan, which was filed as a separate document prior to April 2009
EEPR	Energy Efficiency Plan and Report
EER	Energy Efficiency Report, which was filed as a separate document prior to April 2009
EE Rule	Energy Efficiency Rule, 16 Tex. Admin. Code § 25.181 and § 25.183
EM&V	Evaluation, Measurement and Verification
ERCOT	Electric Reliability Council of Texas
HTR	Hard-To-Reach
M&V	Measurement and Verification
MTP	Market Transformation Program
PUCT	Public Utility Commission of Texas
REP	Retail Electrical Provider
RES	Residential
SCORE	Schools Conserving Resources
SOP	Standard Offer Program

Glossary

Please refer to 16 TAC § 25.181(c) for a full list of definitions.

Appendix

Reported Demand and Energy Reduction by County 2021

Open Small Business MTP		
County	**kW**	**kWh**
Bosque	118	443,082
Brazoria	19	16,831
Denton	158	350,913
Galveston	179	369,903
Hamilton	57	248,032
Somervell	40	148,974
Totals	**571**	**1,577,735**

SCORE/CitySmart MTP		
County	**kW**	**kWh**
Bosque	3	15,594
Brazoria	464	1,641,128
Collin	179	540,347
Denton	73	279,597
Fannin	11	16,735
Galveston	148	837,227
Grayson	8	23,431
Bosque	3	15,594
Totals	**886**	**3,354,059**

Commercial Solutions MTP		
County	**kW**	**kWh**
Brazoria	36	201,783
Denton	397	1,827,743
Galveston	415	2,074,703
Hill	21	148,159
Pecos	2	9,436
Reeves	153	797,394
Totals	**1,024**	**5,059,218**

Load Management SOP		
County	**kW**	**kWh**
Bosque	1,666	1,666
Brazoria	2,066	2,066
COLLIN	87	87
CORYELL	66	66
DENTON	317	317
GALVESTON	490	490
Galveston	0	0
REEVES	253	253
WINKLER	133	133
Totals	**5,078**	**5,078**

High-Performance Homes MTP		
County	**kW**	**kWh**
Brazoria	88	230,868
Collin	11	36,202
Denton	1	3,105
Galveston	469	1,140,672
Totals	**569**	**1,410,848**

Residential SOP		
County	**kW**	**kWh**
Bosque	15	27,248
Brazoria	195	669,970
Collin	525	1,075,827
Coryell	27	60,762
Denton	962	2,281,097
Fannin	3	4,692
Galveston	484	1,199,468
Grayson	1	2,990
Hamilton	21	37,732
Mclennan	17	38,565
Reeves	1	983
Somervell	165	345,758
Winkler	7	10,990
Totals	**2,424**	**5,756,081**

Hard-to-Reach SOP		
County	**kW**	**kWh**
Brazoria	77	145,406
Collin	123	230,799
Denton	182	395,013
Fannin	11	22,915
Galveston	74	134,732
Grayson	6	11,592
Reeves	13	26,960
Winkler	51	94,411
Totals	**536**	**1,061,828**

Low Income Weatherization		
County	**kW**	**kWh**
Brazoria	140	224,965
Denton	113	245,415
Fannin	2	2,715
Galveston	342	466,872
Grayson	1	1,361
Lamar	7	13,547
Rains	1	2,387
Totals	**606**	**957,262**